

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT  
EASTERN DIVISION**

In Re:

	:	Case No. 08-59297
Steven Thomas Crumbacher	:	
Laura Lynn Crumbacher	:	Chapter 13
	:	Judge Preston

Debtor(s).

**MOTION TO REOPEN CHAPTER 13 BANKRUPTCY PURSUANT  
TO 11 U.S.C. § 350(b)**

Now comes Debtors, Steven and Laura Crumbacher, by and through counsel, who moves this Court for an order reopening Debtors' Chapter 13 case. Support for this motion is delineated in the Memorandum below.

Respectfully submitted,

/s/ Matthew J. Thompson  
Matthew J. Thompson (0040759)  
**Nobile & Thompson Co., L.P.A.**  
4876 Cemetery Road  
Hilliard, OH 43026  
(614) 529-8600  
(614) 529-8656 Fax  
mjthompson@ntlegal.com

**MEMORANDUM IN SUPPORT**

Debtors request this motion to reopen their bankruptcy case in order to file a Financial Management certificate and Debtors' Certification Regarding Issuance of Discharge Order.

**WHEREFORE**, Debtors, Steven and Laura Crumbacher, respectfully requests from this Court an Order reopening their Chapter 13 bankruptcy case.

Respectfully submitted,

/s/ Matthew J. Thompson

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing Motion to Reopen Chapter 13 Bankruptcy and Notice was served by electronic mail upon: The US Trustee, The Chapter 13 Trustee, Edward A. Bailey, Flavia Van Heeswijk, and Brian M. Gianangeli; and by regular U.S. Mail on this 16th day of July 2014 upon:

Steven & Laura Crumbacher  
2284 Maribeth Place  
Grove City OH 43123

All creditors on the attached matrix

/s/ Matthew J. Thompson  
Matthew J. Thompson (0040759)  
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Hilliard, OH 43026  
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[mjthompson@ntlegal.com](mailto:mjthompson@ntlegal.com)

**Form 20A NOTICE OF MOTION**

The Debtor(s) has/have filed papers with this Court requesting the relief sought in the Motion enclosed with this NOTICE.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to GRANT the relief requested in the enclosed MOTION, or if you want the Court to consider your views on the MOTION, then on or before **21 DAYS FROM THE DATE SET FORTH IN THE CERTIFICATE OF SERVICE OF THIS MOTION**, you or your attorney must:

1. File with the Court, a written response to the MOTION expressing your objection or viewpoint. The response is to be filed with the Clerk of Courts at 170 N. High St. Columbus, Ohio 43215.  
  
If you mail your written response to the Court for filing by the Clerk, you must mail it early enough so the Court will **receive** it on or before the date stated above.
2. You must also mail a copy of the written response to the Debtor(s) at the address listed on the front of this paper entitled Certificate of Service.
3. You must also mail a copy of the written response to **Nobile & Thompson Co., L.P.A. 4876 Cemetery Road, Hilliard, OH 43026.**
4. Finally, you must attend any Court hearing scheduled to consider this MOTION. The Court will likely schedule an oral hearing and serve only those parties who have in fact filed a written response.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the MOTION and may enter an order granting that relief.